

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

|                                |   |                  |
|--------------------------------|---|------------------|
| <b>RONNIE JONES, ET AL.,</b>   | ) |                  |
|                                | ) |                  |
| <b>Plaintiffs,</b>             | ) |                  |
|                                | ) |                  |
| <b>v.</b>                      | ) |                  |
|                                | ) |                  |
|                                | ) | CIVIL ACTION     |
| <b>CITY OF BOSTON, ET AL.,</b> | ) | NO. 05-11832-GAO |
|                                | ) |                  |
| <b>Defendants.</b>             | ) |                  |
|                                | ) |                  |
|                                | ) |                  |

**PLAINTIFFS' MOTION TO COMPEL PSYCHEMEDICS CORPORATION'S  
COMPLIANCE WITH THIS COURT'S DECEMBER 14, 2007 ORDER**

On December 14, 2007, this Court ordered third-party Psychomedics Corporation (“Psychomedics”) to produce, among other things, certain portions of its Standard Operating Procedures (“SOPs”) pursuant to an existing Confidentiality Order entered by this Court. More than two months after this Order was entered, Psychomedics has refused to produce the SOPs. While Psychomedics has produced certain documents, Psychomedics has not fully complied with all aspects of this Court’s December 14, 2007 Order.

Accordingly, Plaintiffs, Ronnie Jones, Richard Beckers, Walter Washington, William Earl Bridgeforth, Shawn N. Harris, Eugene Wade George C. Downing, Jr., Clararise Bristow, Rachelle Couch, Keri Hogan, and the Massachusetts Association of Minority Law Enforcement Officers, (collectively, the “Plaintiffs”) hereby respectfully move to compel Psychemedics to comply with this Court’s December 14, 2007 Order. As grounds for this motion, Plaintiffs incorporate their Memorandum in Support of Plaintiffs’ Motion to Compel Psychemedics Corporation’s Compliance With This Court’s December 14, 2007 Order and the Affidavit of William F. Benson, which are filed herewith.

Further, because Psychemedics has no good faith basis for continuing to withhold those portions of its SOPs that the Court ordered to be produced, Psychemedics should be ordered to

pay the Plaintiffs' costs, including attorneys' fees, incurred in bringing this Motion, in an amount to be determined upon submission of an affidavit setting forth such costs.

WHEREFORE, Plaintiffs respectfully request that this Court grant this Motion and Order Psychomedics Corporation to:

1. Comply with this Court's December 14, 2007 Order and produce to Plaintiffs within two business days of this Order those portions of the Standard Operating Procedures ("SOPs") identified in the December 14, 2007 Order pursuant to the existing Order Governing the Production and Exchange of Confidential Information (the "Confidentiality Order"), without any changes or amendments to the Confidentiality Order;
2. Fully comply with this Court's December 14, 2007 Order by no later than March 18, 2008; and
3. Pay the Plaintiffs' costs, including attorneys' fees, incurred in bringing this Motion, in an amount to be determined upon submission of an affidavit by Plaintiffs' counsel setting forth such costs.

Respectfully submitted,

**Ronnie Jones, Richard Beckers, Walter Washington, William Earl Bridgeforth, Shawn N. Harris, Eugene Wade George C. Downing, Jr., Clararise Bristow, and the Massachusetts Association of Minority Law Enforcement Officers,**

By their attorneys,

/s/ William F. Benson

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Dated: February 22, 2008

**Local Rule 7.1(A)(2) Certification**

Undersigned counsel for plaintiffs certifies that he conferred with Meredith M. Leary, Esq., and Peter A. Biagetti, Esq., counsel for Psychomedics Corporation, and attempted in good faith to resolve or narrow the issues presented in this motion.

/s/ William F. Benson  
William F. Benson

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants, by federal express, on February 22, 2008.

/s/ William F. Benson  
William F. Benson